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*Attorneys for Irving H. Picard Trustee for
The substantively consolidated SIPA liquidation
of Bernard L. Madoff Investment Securities LLC
and Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

LION GLOBAL INVESTORS LIMITED,

Defendant.

Adv. Pro. No. 11-02540 (CGM)

**DECLARATION OF ROBERTSON D. BECKERLEGGE IN SUPPORT OF THE
TRUSTEE'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

I, Robertson D. Beckerlegge, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with Baker & Hostetler LLP, counsel to Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§78aaa *et seq.*, and the Chapter 7 estate of Bernard L. Madoff. I submit this Declaration in support of the Trustee’s Opposition to Defendant Lion Global Investors Limited’s Motion to Dismiss.
2. Although several documents attached to this Declaration are stamped confidential, the Trustee’s records indicate that the producing parties have de-designated the documents as not confidential under the Litigation Protective Order entered in this liquidation. See *SIPC v. BLMIS (In re BLMIS)*, Adv. Pro. No. 08-01789 (CGM) (Bankr. S.D.N.Y. June 6, 2011 & Sept. 17, 2003), ECF Nos. 4137 & 5474. In addition, all personal identifying information has been redacted.
3. Attached hereto as Exhibit 1 is a true and correct copy of a page from the website of Oversea-Chinese Banking Corporation Limited located at [<https://www.ocbc.com.my/group/who-we-are/heritage-singapore.html?>] (last visited on May 26, 2022).
4. Attached hereto as Exhibit 2 is a true and correct copy of a document purporting to be a Media Release, dated April 19, 2004, announcing “New Joint Venture Company, Fairfield Straits Lion, to Develop Hedge Fund Products in Asia.” (SECSEV0089441-SECSEV0089443).
5. Attached hereto as Exhibit 3 in redacted form is a true and correct copy of a portion of a document referencing Order Detail for Fairfield Sentry Limited from January 1, 2004 and April 7, 2008 (ANWAR-C-ESI-00254836). This exhibit was originally produced as part

of a 64-page document. The full document is available upon request.

6. Attached hereto as Exhibit 4 in redacted form is a true and correct copy of a portion of a document referencing Order Detail for Fairfield Sentry Limited between January 1, 2004 and January 1, 2009 (ANWAR-C-ESI-00256724 - ANWAR-C-ESI-00256726). This exhibit was originally produced as part of a 47-page document. The full document is available upon request.
7. Attached hereto collectively as Exhibit 5 in redacted form are true and correct copies of CITCO documents referencing redemptions from Fairfield Sentry Limited (CFSSAD0006410; CFSSAD0006411; CFSSAD0006412; CFSSAD0006413; CFSSAD0006414; CFSSAD0006415).
8. Attached hereto as Exhibit 6 is a true and correct copy of a LinkedIn page for Foo Cheong Tong found at [<https://sg.linkedin.com/in/tong-foo-cheong-ab0715>] (last visited on May 26, 2022).
9. Attached hereto as Exhibit 7 is a true and correct copy of Daniel Chan's biography on the website of DCG Capital found at [<https://www.dcginvest.com/our-team/daniel-chan/>] (last visited on May 26, 2022).
10. Attached hereto as Exhibit 8 is a true and correct copy of an email correspondence containing the "@lookforlion" email suffix for Lion Global Investors Limited (SECSEV2236745-SECSEV2236746).
11. Attached hereto as Exhibit 9 in redacted form is a true and correct copy of documents referencing "KYC Documentation Package for Investors" that shows Lion Capital Management Limited's address (SECSEV2250928- SECSEV2250930).
12. Attached hereto as Exhibit 10 is a true and correct copy of a document purporting to show

a draft agenda for Straits Lion Asset Management's visit to Fairfield Greenwich Group on July 17- July 28, 2004 (SECSEV2381814- SECSEV2381818).

13. Attached hereto collectively as Exhibit 11 in redacted form are true and correct copies of Fairfield Sentry Limited's Confidential Private Placement Memorandum dated July 1, 2003 and accompanying email correspondence dated August 18, 2004 (SECSEV0603251- SECSEV0603320; SECSEV0603168-SECSEV0603169).
14. Attached hereto as Exhibit 12 is a true and correct copy of a Fairfield Sentry Limited Class B update dated July 2004 (SECSEV0603323).
15. Attached hereto as Exhibit 13 is a true and correct copy of a Fairfield Sentry Limited Semi-Annual Update for 3rd and 4th Quarters, 2004, dated February 25, 2005 (SECSEV0747823-SECSEV0747826).
16. Attached hereto as Exhibit 14 is a true and correct copy of an email correspondence dated May 30, 2005 (SECSEV0617025-SECSEV0617029).
17. Attached hereto as Exhibit 15 is a true and correct copy of an email correspondence dated May 20, 2005 (FG-00186026- FG-00186027).
18. Attached hereto as Exhibit 16 is a true and correct copy of an email correspondence dated May 25, 2005 (FG-00186618- FG00186619).
19. Attached hereto as Exhibit 17 is true and correct copy of a page from Lion Global Investors website located at [<https://www.lionglobalinvestors.com/en/about-us.html>] (last visited on May 27, 2022).
20. Attached hereto as Exhibit 18 is a true and correct copy of page from Unique Entity Number website located at[<https://www.uen.gov.sg/ueninternet/faces/pages/uenSrch.jspx>] (last visited on May 31, 2022) showing Straits Lion Assessment Management's address.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June
1, 2022, in New York, New York.

/s/ Robertson D. Beckerlegge
Robertson D. Beckerlegge